

RCRA FACILITY ASSESSMENT EVALUATION
PRELIMINARY REVIEW AND VISUAL SITE INSPECTION

(NO SAMPLING VISIT)

Region VI, Technical Compliance Section

FACILITY'S NAME(S): Texaco Refining and Marketing

EPA ID NUMBER: TX0007378995

ADDRESS: 315 S. Grand Street, Amarillo, TX 79104

LOCATION: Randall County

DATE OF INSPECTION: July 15, 1987

SITE DESCRIPTION: Petroleum Refinery

PREPARED BY: H.D. Johns, TNC DATE PREPARED: August 5, 1987

REVIEWED BY: L. G. Kurovski DATE REVIEWED: September 15, 1987

ANTICIPATED PERMIT DATE: June 30, 1988

ANY ON-GOING STATE/FED 264, 265, or 270 CORRECTIVE ACTION OR CERCLA ACTION:
On going investigation for possible 3004(h) or Corrective Action Order by EPA,
Region VI, Hazardous Waste Compliance - Enforcement Section for inadequate
GW monitoring.

DOES FACILITY HAVE A CERCLA FILE? YES X NO

Was a CERCLA PA/SI performed at this facility: Yes

DOES FACILITY HAVE UIC WELL? YES X NO

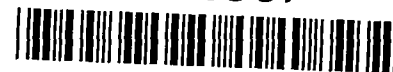
TYPE OF DRINKING WATER SUPPLY WITHIN A 3-MILE RADIUS: The facility is located
directly above the Ogallala Aquifer, which is the primary source of groundwater
in the Amarillo area.

TARGET POPULATION WITHIN A 3-MILE RADIUS: Plant site has residential areas bordering
the plant.

RECOMMENDATIONS: S.V. X R.F.I. I.M. No Further Action under RFA

(Indicate only one unless I.M. is marked)

X 3004(u) 3007



Possible Enforcement Action: 3004(a) X 3004(h)

I. Preliminary Review of Prior or Continuing Releases of Solid Waste Management Units (SWMU)

A. Evaluation of Information

1. The main purpose is to determine whether there has been or may have been a release(s) of hazardous waste or hazardous constituents from any SWMUs which will require corrective action measures under Section 3004(u) of the RCRA Hazardous and Solid Waste Amendments (HSWA) of 1984. The SWMUs of concern are:
 - a) SWMUs not regulated under RCRA; and
 - b) SWMUs regulated under RCRA regardless of whether they are subject to ground water monitoring requirements.
2. The purpose of this review is to:
 - a) Identify all SWMU;
 - b) Identify if there have been prior or continuing releases of hazardous wastes or hazardous constituents from such units to any media (air, surface water, ground water, soil & sub-surface gas);
 - c) Determine if such releases caused environmental contamination that would require corrective action; and
 - d) Determine what additional information or investigation is needed to clarify whether there has been a release or if a potential for a release exists.

II. Visual Site Inspection

A. Purpose

- * Verify PR Information
- * Identify additional releases
- * Assess Condition of Solid Waste Management Units (SWMU)
- * Determine Sampling Locations for a Sampling Visit when applicable

6. NUMBER OF SSWU INVESTIGATED DURING THE PR/VS1: 43

<u>LIST OF SSWU</u>		<u>REGULATED BY RCRA*</u> (SUBTITLE C)	<u>STATUS**</u>	<u>SUBJECT TO GWM***</u> <u>SUBPART F</u>
1)	Surface Impoundment (Water Treating Sludge Pond)	?	I	?
2)	Landfill	Y	I	Y
3)	Land Treatment Unit	Y	A	Y
4)	Injection Well (WDW-135)	Y	A	N
5)	Injection Well (WDW-136)	Y	A	N
6)	Tank (T-359) (Spent Caustic Tank)	Y	I	N
7)	Surface Impoundment (Lead Weathering Impoundment)	Y	I	Y
8)	Tank (T-99)	Y	A	N
9)	Tank (T-100)	Y	A	N
10)	Tank (T-123)	Y	A	N
11)	Tank (T-124)	Y	A	N
12)	Tank (T-125)	Y	A	N
13)	Tank (T-26)	Y	A	N
14)	Tank (T-47)	Y	A	N
15)	Tank (T-90)	Y	A	N
16)	Container Storage Area (Asbestos Storage Bin)	N	A	N
17)	Surface Impoundment (Surge Impoundment)	Y	I	Y
18)	Surface Impoundment (Wastewater Ponds)	N	I	N
19)	Waste Pile (Petroleum Coke Pile)	N	C	N
20)	Surface Impoundment (Wastewater Evaporation Pond #1)	N	C	N
21)	Surface Impoundment (Wastewater Evaporation Pond #2)	N	C	N
22)	DAF Unit	Y	A	N
23)	Tank (Flocculation Tank)	Y	A	N
24)	Tank (Air Tank)	Y	A	N
25)	Tank (Scum Tank)	Y	A	N
26)	Tank (Multimedia Filters)	Y	A	N
27)	Tank (Polishing Filters)	Y	A	N
28)	Tank (T-101)	Y	A	N
29)	Tank (T-102)	Y	A	N
30)	Tank (T-103)	Y	A	N
31)	Tank (T-104)	Y	A	N
32)	Tank (Caustic Neutralization Drum)	N	I	N
33)	Landfill (Leaded Tank Bottoms Disposal Pits-P)	N	C	N

* Y-Yes, N-No, ?-Unknown

** Active, Inactive, or Closed (A, I or C)

*** GWM-Groundwater Monitoring

	<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>STATUS**</u>	<u>SUBPART F</u>
34)	Landfill (Burn Pit Site)	N	C	N
35)	Landfill (Loaded Tank Bottoms Disposal Pits-G)	N	C	N
36)	Landfill (Loaded Tank Bottoms Disposal Pits-H)	N	C	N
37)	Landfill (Loaded Tank Bottoms Disposal Pits-I)	N	C	N
38)	Landfill (Loaded Tank Bottoms Disposal Pits-J)	N	C	N
39)	Landfill (Loaded Tank Bottoms Disposal Pits-K)	N	C	N
40)	Landfill (Loaded Tank Bottoms Disposal Pits-L)	N	C	N
41)	Landfill (Loaded Tank Bottoms Disposal Pits-M)	N	C	N
42)	Landfill (Loaded Tank Bottoms Disposal Pits-N)	N	C	N
43)	Landfill (Loaded Tank Bottoms Disposal Pits-O)	N	C	N

C. NUMBER SWMU TO BE INCLUDED IN THE RFI: 31
(Except RCRA units subject to Subpart F refer to Section E)

	<u>LIST OF SWMU</u>	<u>RATIONALE</u>
1-13)	Tanks (T-26) (T-47) (T-90) T-99) (T-100) (T-101) (T-102) (T-103) (T-104) (T-123) (T-124) (T-125) (T-358)	Due to the age of the tanks and the soil base beneath the units, soil borings are needed beneath and around the tanks to determine whether there have been any releases to the soil.
14)	Surface Impoundment (Water Treating Sludge Ponds)	These water treating sludge ponds managed K048 and D007 wastes. Inadequate information is available to determine the age or past operating practices of these units. Also, TWC's Groundwater Enforcement is working with Texaco under an Agreed Order dated 12/16/86.
15)	Container (Asbestos Storage Bin)	Due to the age of this unit, there is a high potential that a release has occurred. Soil samples should be taken around and beneath this unit to determine if a release has occurred.
16)	Tank (Caustic Neutralization Drum)	Due to the age of this unit and insufficient data available to determine the potential for release to other media, an RFI was recommended.

LIST OF SWMURATIONALE

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| 17) Landfill (Leaded Tank Bottoms Disposal Pit Pit-P) | This unit, closed in 1967 (pre-RCRA), managed TEL sludge. Insufficient data is available for a release determination. |
| 18) Landfill (Burn Pit) | Due to the age of the unit, the nature of the wastes and past operating practices, soil samples should be taken around and beneath this unit to determine whether this unit has released any hazardous constituents to the environment. |
| 19) Waste Pile (Petroleum Coke Pile) | Due to the age of the unit, type of waste managed, and operating practices, soil samples should be taken beneath and around the unit to determine whether this unit has released any hazardous constituents. |
| 21) Surface Impoundment (Evaporation Ponds #1 and #2) | Soil samples taken August 26, 1986 indicated that these units had released hazardous constituents to the environment. This unit closed in 1977 (pre-RCRA). Groundwater monitoring system should be installed to determine the extent of the contamination, and also a Corrective Action program should be implemented. |
| 22) Surface Impoundment (Wastewater Ponds) | In the Part B Application, documentation noted that there has been releases associated with this unit. A groundwater monitoring system should be installed to determine the extent of the contamination, and also a Corrective Action program should be implemented. |
| 23-31) Landfill (Leaded Tank Bottoms Disposal) [Pit G] [Pit H] [Pit T] [Pit J] [Pit K] [Pit L] [Pit M] [Pit N] [Pit O] | These landfills closed pre-RCRA. Insufficient data exists about the liner and type of waste managed. Due to the age of these units and the lack of groundwater monitoring system, soil sampling around and beneath the unit is needed to determine whether these units has release hazardous constituents. If it is determine these units had a released, a groundwater monitoring system is needed to determine the extent of contamination. |

- D. NUMBER OF SWMU WITH NO INDICATED RELEASES: 9
(Documentation is necessary for a SWMU to be included in this category.)

<u>LIST OF SWMUs</u>	<u>RATIONALE</u>
1) Land Treatment Unit	The land treatment unit utilizes dikes and a concrete sump with a pump to prevent run-off. GW has not detected a release; however, the GW monitors in this area have been determined to be inadequate. Permit provisions will require GW compliance for this unit.
2-3) Injection Wells (WDW-135) and (WDW-136)	UIC report, February 1987, states that the wells are in compliance with applicable regulations.
4) Tank (DAF Unit)	This above-ground tank has an adequate concrete containment system if there was a release.
5) (Flotation Tank)	This above-ground tank has an adequate concrete containment system if there was a release.
6) Tank (Air Tank)	This above-ground tank has an adequate concrete containment system if there was a release.
7) Tank (Scum Tank)	This above-ground tank has an adequate concrete containment system if there was a release.
8) Tank (Multimedia Filters)	This above-ground tank has an adequate concrete containment system if there was a release.
9) Tank (Polishing Filters)	The above-ground tank has an adequate concrete containment system if there was a release.

- E. SUPPLEMENTAL INFORMATION ON RCRA REGULATED UNITS: 3
(Describe any problems identified or suspected from regulated units including identified releases to groundwater)

<u>LIST OF SWMU</u>	<u>CONCERNS</u>
1) Surface Impoundment (Surge Impoundment)	Texaco has submitted a closure plan for this unit. They plan to empty the impoundment, clean the liner, and certify a closure by removal of any waste residual. There are <u>no</u> groundwater monitoring wells surrounding the

unit. The facility failed to implement a groundwater monitoring plan pursuant to 40 CFR 265 Subpart F for the RCRA surface impoundment. The closure plan is under review by TWC.

2) Surface Impoundment (Lead Weathering Impoundment)

Texaco has submitted a closure plan for this unit. They plan to close by removing all the waste. Inadequate groundwater monitoring system has been reported by TWC. The closure plan is under review by TWC.

3) Landfill

An in-place closure plan has been submitted to TWC. Inadequate groundwater monitoring has been reported by TWC. The closure plan is under review by TWC.

II. FINDINGS

A. RECOMMENDATIONS: (EPA, STATE and/or CONTRACTOR)

State:

Thirty-one (31) units were recommended for further investigation under a RFI. Texaco has submitted closure plans for two (2) surface impoundments and one (1) landfill to TWC. The closures include removal of all the wastes in the surface impoundments and an in-place closure plan for the landfill. All the closure plans are under review by TWC.

Corrective Action was recommended for the Evaporation Ponds and Wastewater Ponds. These surface impoundments had documented releases associated with them. They will be included in the RFI to determine the extent of the contamination.

EPA

EPA agrees with the above said recommendations.

CONCUR: LYDIA M. BOADA CLISTA

DATE: SEPTEMBER 15, 1987